



December 21, 2010

Michael Berkoff
United States Environmental Protection Agency, Region 5
Mail Code: SRF-6J
77 West Jackson Boulevard
Chicago, Illinois 60604

**Re: Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Allied Paper, Inc. Operable Unit – Groundwater Treatment Plant Data**

Dear Mr. Berkoff:

On behalf the Lyondell Environmental Custodial Trust, ENVIRON International Corporation (ENVIRON) is pleased to submit to you the analytical results from the Groundwater Treatment Plant (GWTP) sampling event that was conducted at the Allied Paper Inc. Operable Unit in Kalamazoo, Michigan (the "Site").

On November 16, 2010, the City of Kalamazoo collected samples of the GWTP effluent at the Site and ENVIRON collected spilt samples in conjunction with the City of Kalamazoo. One composite sample and four grab samples were collected during the day. The samples collected by ENVIRON were submitted under the appropriate chain-of-custody protocol to KAR Laboratories, Inc. located in Kalamazoo, Michigan for analysis. The composite sample was analyzed for polychlorinated biphenyls (PCBs), total suspended solids (TSS), metals, chemical oxygen demand (COD), phosphorus, and total petroleum hydrocarbons (TPH). The four grab samples were analyzed for volatile organic compounds (VOCs), pH, total cyanide, and available cyanide. The analytical data report is provided as Attachment 1.

The only analyte detected above its respective detection limit was COD at a concentration of 20 milligrams per liter (mg/L) in the GWTP effluent composite sample. The pH of the grab samples ranged from 7.1 to 7.2. COD is not regulated in the City of Kalamazoo "Wastewater Service Individual Control Document" for the Site (the "Control Document"). The measured pH values were within the allowable pH range (6.2 to 9.8) presented in the Control Document.

If you have any questions or comments regarding the above, please feel free to contact Barbara Coughlin or Mark Travers at 312.288.3800.

Sincerely,

ENVIRON International Corporation

Barbara R. Coughlin, PhD
Senior Manager

Mark A. Travers, PG
Principal

Attachment

cc: Lyondell Environmental Custodial Trust
Nicole Wood-Chi – USEPA
Don Houston – ENVIRON

ATTACHMENT 1



4125 Manchester
Road
Kalamazoo, MI 49001
Phone 269-381-9666
Fax 269-381-9698
www.karlabs.com

ENVIRON
268 East Alcott Street
Kalamazoo, MI 49001

Attn : Ms. Liz Howard

KAR Project No. : 104876
Date Reported : 12/02/10
Date Activated : 11/16/10
Date Due : 12/02/10
Date Validated : 12/02/10

Project

Description : Analysis of five aqueous samples from Allied Paper.

Dear Client,

Your laboratory data is presented to you in this report. Unless otherwise stated under the "Comments" heading, all tests were performed within the maximum allowable holding times, have met or exceeded QC requirements and the result represents the sample as it was received. If a sample was identified as drinking water under the Safe Drinking Water Act, the "Comments" column may also contain federal drinking water information including MCL which is the Maximum Contaminant Level set by USEPA. Values enclosed in brackets ([]) are Secondary MCL's and are non-enforceable guidelines for aesthetic quality.

If you wish to contact us about this work please mention KAR Project No. 104876. To arrange additional sampling or testing please contact our Client Services Department. If you have any questions regarding quality assurance please contact us.

Thank you for the opportunity to serve you. Please do not hesitate to call if we can provide additional assistance.

Respectfully submitted,

A handwritten signature in black ink that reads 'David R. Alkema'.

David R. Alkema
Laboratory Manager

KAR Laboratories, Inc. maintains Full Certification status for Bacteriology, Inorganics, Regulated Organics and Synthetic Organics through USEPA, Michigan Department of Public Health and Indiana State Department of Health. This report may only be reproduced in full and not without the written consent of **ENVIRON**.

LABORATORY DETAIL REPORT

Client: **ENVIRON**

KAR Project No. : **104876**

Attest: 
David R. Alkema, Lab Manager

Date Reported: **12/02/10**

Project

Description: **Analysis of five aqueous samples from Allied Paper.**

Sample ID : **"GWTP Effluent Composite. (0900, 1100, 1255, 1500)"**

Sampled By : **EAH of ENVIRON**

Date Received : **11/16/10**

Sample Date : **11/16/10**

Sample Type : **aqueous**

Sample Time :

KAR Sample No. : **104876-01**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Prep, Hg	Completed		EPA 245.2	11/23/10	DBL	
Prep, metals	Completed		EPA 30xx, 200.x	11/17/10	DBL	
Arsenic, total, low level	<5	ug/L	EPA 200.8	11/29/10	PML	
Cadmium, total, low level	<1	ug/L	EPA 200.8	11/29/10	PML	
Chromium, total, low level	<5	ug/L	EPA 200.8	11/29/10	PML	
Copper, total, low level	<5	ug/L	EPA 200.8	11/29/10	PML	
Lead, total, low level	<5	ug/L	EPA 200.8	11/29/10	PML	
Lithium, total, low level	<5	ug/L	EPA 200.7	11/29/10	DBL	
Mercury, total, low level	<0.2	ug/L	EPA 245.2	11/23/10	DBL	
Molybdenum, total, low level	<5	ug/L	EPA 200.8	11/30/10	PML	
Nickel, total, low level	<5	ug/L	EPA 200.8	11/29/10	PML	
Selenium, total	<5	ug/L	EPA 200.8	11/29/10	PML	
Silver, total, low level	<2.5	ug/L	EPA 200.8	11/29/10	PML	
Zinc, total, low level	<10	ug/L	EPA 200.8	11/29/10	PML	
COD	20	mg/L	EPA 410.4	11/30/10	DBL	
Gravimetric TPH (SGT-HEM)	<5	mg/L	EPA 1664	11/18/10	GMB	
Phosphorus, total (as P)	<0.02	mg/L	SM 4500-P B5,E	11/26/10	JHB	
Suspended solids, total	<4	mg/L	SM 2540 D	11/17/10	JHB	
Prep, ECD	Completed		EPA 608	11/22/10	GMB	
PCB	See below		EPA 608	11/23/10	GMB	
PCB Aroclor 1016	<0.1	ug/L	EPA 608	11/23/10	GMB	
PCB Aroclor 1221	<0.1	ug/L	EPA 608	11/23/10	GMB	
PCB Aroclor 1232	<0.1	ug/L	EPA 608	11/23/10	GMB	
PCB Aroclor 1242	<0.1	ug/L	EPA 608	11/23/10	GMB	
PCB Aroclor 1248	<0.1	ug/L	EPA 608	11/23/10	GMB	
PCB Aroclor 1254	<0.1	ug/L	EPA 608	11/23/10	GMB	
PCB Aroclor 1260	<0.1	ug/L	EPA 608	11/23/10	GMB	
PCB Aroclors, total	NA		EPA 608	11/23/10	GMB	

KAR Laboratories, Inc.

(269) 381-9666

LABORATORY DETAIL REPORT

Client: **ENVIRON**

Attest: 
David R. Alkema, Lab Manager

KAR Project No. : **104876**

Date Reported: **12/02/10**

Project

Description: *Analysis of five aqueous samples from Allied Paper.*

Sample ID : **"GWTP Effluent, Grab #1"**

Sampled By : **EAH of ENVIRON**

Sample Date : **11/16/10**

Sample Time : **0910**

Date Received : **11/16/10**

Sample Type : **aqueous**

KAR Sample No. : **104876-02**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Cyanide, available	<0.002	mg/L	OIA-1677	11/23/10	JHB	
Cyanide, total	<0.005	mg/L	SM 4500-CN C,E	11/29/10	ALK	
PH	7.2	S.U.	SM 4500-H B	11/16/10	SSD	

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LABORATORY DETAIL REPORT

Client: **ENVIRON**

KAR Project No. : **104876**

Attest: 
David R. Alkema, Lab Manager

Date Reported: **12/02/10**

Project

Description: *Analysis of five aqueous samples from Allied Paper.*

Sample ID : **"GWTP Effluent, Grab #2"**

Sampled By : **EAH of ENVIRON**

Sample Date : **11/16/10**

Sample Time : **1100**

Date Received : **11/16/10**

Sample Type : **aqueous**

KAR Sample No. : **104876-03**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Cyanide, available	<0.002	mg/L	OIA-1677	11/23/10	JHB	
Cyanide, total	<0.005	mg/L	SM 4500-CN C,E	11/29/10	ALK	
PH	7.1	S.U.	SM 4500-H B	11/16/10	SSD	

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LABORATORY DETAIL REPORT

Client: **ENVIRON**

Attest: 
David R. Alkema, Lab Manager

KAR Project No. : **104876**

Date Reported: **12/02/10**

Project

Description: *Analysis of five aqueous samples from Allied Paper.*

Sample ID : **"GWTP Effluent, Grab #3"**

Sampled By : **EAH of ENVIRON**

Sample Date : **11/16/10**

Sample Time : **1300**

Date Received : **11/16/10**

Sample Type : **aqueous**

KAR Sample No. : **104876-04**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Cyanide, available	<0.002	mg/L	OIA-1677	11/23/10	JHB	
Cyanide, total	<0.005	mg/L	SM 4500-CN C,E	11/29/10	ALK	
FH	7.1	S.U.	SM 4500-H B	11/16/10	SSD	

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LABORATORY DETAIL REPORT

Client: **ENVIRON**

KAR Project No. : **104876**

Attest: 
David R. Alkema, Lab Manager

Date Reported: **12/02/10**

Project

Description: **Analysis of five aqueous samples from Allied Paper.**

Sample ID : **"GWTP Effluent, Grab #4"**

Sampled By : **EAH of ENVIRON**

Date Received : **11/16/10**

Sample Date : **11/16/10**

Sample Type : **aqueous**

Sample Time : **1500**

KAR Sample No. : **104876-05**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Cyanide, available	<0.002	mg/L	OIA-1677	11/23/10	JHB	
Cyanide, total	<0.005	mg/L	SM 4500-CN C.E	11/29/10	ALK	
PH	7.1	S.U.	SM 4500-H B	11/16/10	SSD	

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LABORATORY DETAIL REPORT

Client: **ENVIRON**

KAR Project No. : **104876**

Attest: 
David R. Alkema, Lab Manager

Date Reported: **12/02/10**

Project

Description: **Analysis of five aqueous samples from Allied Paper.**

Sample ID : **"Composite of GWTP Effluent, Grab #1-#4"**

Sampled By : **EAH of ENVIRON**

Date Received : **11/16/10**

Sample Date : **11/16/10**

Sample Type : **aqueous**

Sample Time :

KAR Sample No. : **104876-06**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
MDNR Scan 2	See below		EPA 624	11/24/10	JAR	
Prep. VOA	Completed		EPA 624	11/24/10	JAR	
Acetone	<50	ug/L	EPA 624	11/24/10	JAR	
Benzene	<1	ug/L	EPA 624	11/24/10	JAR	
Ethylbenzene	<1	ug/L	EPA 624	11/24/10	JAR	
m-and/or p-xylene	<1	ug/L	EPA 624	11/24/10	JAR	
Methylene chloride	<1	ug/L	EPA 624	11/24/10	JAR	
O-Xylene	<1	ug/L	EPA 624	11/24/10	JAR	
Toluene	<1	ug/L	EPA 624	11/24/10	JAR	

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